

MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, New York 10104
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Gary S. Lee
Norman S. Rosenbaum
Jordan A. Wishnew

*Counsel for the Debtors and
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
-----)	

**DEBTORS' STATEMENT CONFIRMING NO OBJECTION TO THE DEBTORS'
FIRST OMNIBUS OBJECTION TO THE PROOF OF CLAIM FILED BY
ANGELA GENESCO (CLAIM NO. 5732)**

Debtor Residential Capital, LLC and its affiliated debtors in these chapter 11 cases (collectively, the "Debtors") respectfully submit this statement (the "Statement") confirming that claimant Angela Genesco does not object to the *Debtors' First Omnibus Objection to Claims (Late-Filed Claims)* [Docket No. 3575] (the "First Omnibus Claims Objection")¹ as it relates to her Late Filed Claim (Claim No. 5732).

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the First Omnibus Claims Objection.

STATEMENT

1. By the First Omnibus Claims Objection, the Debtors seek to expunge the Late-Filed Claim filed by claimant Angela Genesco (Claim No. 5732) because it was received by the Debtors' claims and noticing agent, Kurtzman Carson Consultants LLC and the Court after the Bar Date.

2. Subsequent to receiving notice of the First Omnibus Claims Objection, Ms. Genesco did not file a formal response or objection. Instead, Ms. Genesco called Debtors' counsel on or about May 20, 2013 and numerous times thereafter in connection with her Proof of Claim. Counsel to the Debtors and Ms. Genesco conferred on those occasions and discussed the purpose of the First Omnibus Claims Objection with respect to the Late-Filed Claim (Claim No. 5732), as well as the alleged basis for the Late-Filed Claim. Pursuant to these discussions and given Ms. Genesco's personal circumstances, the Debtors agreed to review their books and records in connection with her Late-Filed Claim. On July 9, 2013, counsel to the Debtors and Ms. Genesco had a telephone conversation that resulted in a mutual understanding that the First Omnibus Claims Objection against Ms. Genesco's Late-Filed Claim was appropriate, and Ms. Genesco had no intention of filing an objection to the disallowance and expungement of her Late-Filed Claim. Thereafter, the Debtors sent an email to Ms. Genesco confirming her understanding that the purpose of the First Omnibus Claims Objection was to disallow and expunge the Late-Filed Claim (Claim No. 5732) from the claims register, and as a result, she would no longer have a claim against the Debtors' estates. Debtors' counsel spoke with Ms. Genesco, who confirmed her understanding in writing that she did not oppose the relief requested in the First Omnibus Claims Objection.

3. Based on these communications, it is the Debtors' understanding that Ms. Genesco does not object to the relief requested in the First Omnibus Claims Objection as it relates to her Late-Filed Claim.

Dated: July 15, 2013
New York, New York

Respectfully submitted,

/s/ Norman S. Rosenbaum

Gary S. Lee
Norman S. Rosenbaum
Jordan A. Wishnew
MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, New York 10104
Telephone: (212) 468-8000
Facsimile: (212) 468-7900

*Counsel for the Debtors and
Debtors in Possession*